

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

ECIMOS, LLC,)	
)	
Plaintiff,)	
)	
v.)	No. 2:15-cv-02726-JPM-cgc
)	
CARRIER CORPORATION,)	
PATRICK L. WHITE,)	
ENGINEERING CONTROLS AND)	
INTEGRATION, LLC,)	
)	
Defendants.)	
)	
PATRICK WHITE and ENGINEERED)	
CONTROLS AND INTEGRATION, LLC,)	
)	
Counter-Plaintiffs,)	
)	
v.)	
)	
ECIMOS, LLC, and STEPHEN G. OLITA,)	
Individually and as a member of ECIMOS,)	
LLC and ENGINEERED CONTROLS)	
AND INTEGRATION, LLC,)	
)	
Counter-Defendants.)	

**ECIMOS, LLC AND STEPHEN G. OLITA'S PROPOSED JURY INSTRUCTIONS,
PROPOSED JURY VERDICT FORM AND PROPOSED JURY VOIR DIRE
QUESTIONS**

Plaintiff/Counter-Defendants, ECIMOS, LLC, and Stephen G. Olita, in addition to the Court's general jury instructions, request the following jury instructions for the trial on ownership issues set for February 27, 2017, as follows: T.P.I. Civil – 13.01, 13.02, 13.03, 13.04, 13.09, 13.10, 13.11, 13.12, 13.13, 13.14, 13.16.

Plaintiff/Counter-Defendants, ECIMOS, LLC, and Stephen G. Olita, submit the following for the Jury Verdict Form:

Did New ECI and Patrick White prove, by a preponderance of the evidence, that New ECI is the rightful owner of all tangible and intangible assets of ECIMOS, including, but not limited to, software patents, trade names, goodwill, copyrights, contracts, and any other intellectual property?

ANSWER: _____
YES _____ NO _____

Plaintiff/Counter-Defendants, ECIMOS, LLC, and Stephen G. Olita, have no requested jury voir dire questions in addition to the Court's customary jury voir dire questions.

Respectfully submitted,

/s/ Ralph T. Gibson
Everett B. Gibson (BPR #7868)
Ralph T. Gibson (BPR #14861)
J. O'Neal Perryman (BPR #32601)
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was forwarded to counsel for all parties via the Court's ECF system on this the 13th day of February, 2017:

/s/ Ralph T. Gibson
Ralph T. Gibson